

UNITED STATES OF AMERICA  
EASTERN DISTRICT OF WISCONSIN

---

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 13-CR-193

EDWARD PATTERSON, et al.,

Defendants.

---

**DEFENDANT EDWARD PATTERSON'S  
MOTION TO CONTINUE JURY TRIAL**

Edward Patterson, by his attorney Michael J. Fitzgerald, pursuant to 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B)(iv), moves the Court for an order continuing the jury trial in this case, currently scheduled for May 5, 2014.

As grounds for this request, the defendant refers the Court to the attached affidavit of counsel and submits that additional time is needed for the parties to complete plea negotiations and enter into a final agreement. Thus a continuance would be consistent with the ends of justice, in that additional time for effective preparation is necessary, taking into account the exercise of due diligence. *See* 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B)(iv).

Counsel has been advised that the government does not oppose this request.

FITZGERALD LAW FIRM, S.C.

Dated at Milwaukee, Wisconsin this 28th day of April, 2014.

Respectfully submitted,

FITZGERALD LAW FIRM, S.C.

s/Michael J. Fitzgerald

State Bar No. 1012693

Attorney for Defendant Edward Patterson

Fitzgerald Law Firm, S.C.

526 E. Wisconsin Avenue

Milwaukee, Wisconsin 53202

(414) 221-9600 phone

(414) 221-0600 facsimile

[mfitz@mfitzlaw.com](mailto:mfitz@mfitzlaw.com)